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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 BERNARD YOUNG,
11 Petitioner,
12 vs.
13 RENEE BAKER, *et al.*,
14 Respondents

Case No. 2:18-cv-00110-RFB-VCF

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME
(FIRST REQUEST)**

15 Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada,
16 hereby respectfully move this Court for an order granting a 45 day enlargement of time, to and
17 including April 27, 2020, in which to file and serve a reply to petitioner's opposition to Respondents'
18 motion to dismiss Bernard Young's petition.

19 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure
20 and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and
21 other materials on file herein.

22 Respondents have not requested any prior enlargements of time to respond. This motion is
23 made in good faith and not for the purposes of delay.

24 RESPECTFULLY SUBMITTED this 10th day of March, 2020.

25 AARON D. FORD
Attorney General

26 By: /s/ Geordan Goebel
27 GEORDAN GOEBEL (Bar. No. 13132)
Deputy Attorney General
28

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DECLARATION OF COUNSEL

15 I, Geordan Goebel, hereby states, based on personal knowledge, that the assertions of this
16 declaration are true:

17 1. I am a Deputy Attorney General employed by the Attorney General's Office of the State of
18 Nevada in the Post-Conviction Division (PCD), and I make this declaration on behalf of Respondents'
19 motion for enlargement of time.

20 2. By this motion, I am requesting a forty five (45) day enlargement of time, to and including
21 April 27, 2020, in which to file and serve a reply to petitioner's opposition to Respondents' motion to
22 dismiss Bernard Young's petition. This is my first request for enlargement.

23 3. A reply to the opposition to Respondent's motion to dismiss Bernard Young's petition is
24 currently due March 13, 2020.

25 4. The PCD is responding to this petition. I was very recently assigned this case due to the
26 intra-office transfer of the previous handling attorney. I currently have 22 Federal Habeas matters
27 assigned to me, and I need the additional time to handle an increased case load with other case
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1 deadlines in addition to this case, to complete my review of the voluminous record in this case, and to
2 prepare an appropriate reply to the opposition to the petition.

3 5. This motion for enlargement of time is made in good faith and not for the purpose of
4 unduly delaying the ultimate disposition of this case.

5 6. On March 10, 2020, I telephoned opposing counsel Emma Smith to determine if she had
6 any opposition to my extension of time request. Ms. Smith graciously agreed to my request for
7 additional time.


8 7. Pursuant to 28 U.S.C. § 1746, I hereby certify, under penalty of perjury, that the
9 foregoing is true and correct.

10 Executed on this 10th day of March, 2020.

11 /s/ Geordan Goebel
12 GEORDAN GOEBEL
13 Deputy Attorney General

14
15 **ORDER**

16
17 IT IS SO ORDERED.

18 
19 RICHARD F. BOULWARE, II
20 UNITED STATES DISTRICT JUDGE

21 DATED this 10th day of March, 2020.
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1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the Office of the Attorney General and that on this 10th day
3 of March, 2020, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT**
4 **OF TIME (FIRST REQUEST)**, by U.S. District Court CM/ECF electronic filing to:

5
6 Rene L. Valladares
Federal Public Defender
7 Emma L. Smith
Assistant Federal Public Defender
8 411 E. Bonneville Ave., Ste. 250
Las Vegas, Nevada 89101

9 /s/ Lisa M. Clark